

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

NEW VIRGINIA MAJORITY EDUCATION
FUND, et al.,

Plaintiffs,

v.

GARY SCOTT, in his official capacity as
Fairfax County Registrar, et al.,

Defendants.

Civil Action No.

DECLARATION OF TRAM NGUYEN

Pursuant to 28 U.S.C. § 1746, I, Tram Nguyen, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am the Co-Executive Director of New Virginia Majority Education Fund (New Virginia Majority). I joined New Virginia Majority in 2008.
4. I am an alumna of Barnard College, Columbia University and was a 2010 Lead the Way Fellow at the NYU Robert F. Wagner Graduate School of Public Service.
5. New Virginia Majority is a non-profit group that uses mass organizing, leadership development, and strategic communications to champion the voices of communities of color, women, college students, working people, LGBTs, and youth.

6. New Virginia Majority has visited over 1 million voters and has trained hundreds of organizers and volunteer leaders since its inception. The organization has trained hundreds of poll monitors and staffed regional command centers to respond to citizens' questions about voter eligibility and voting requirements.
7. New Virginia Majority has led voter registration drives throughout the Commonwealth resulting in thousands of new voters, including several thousand who recently had their rights restored.
8. In the weeks leading up to the voter registration deadline for the November 2019 election, New Virginia Majority has helped over 6,000 Virginians register to vote.
9. New Virginia Majority has been conducting voter registration drives on George Mason University's campus this year, beginning in July of 2019. New Virginia Majority has been conducting voter registration drives on GMU's campus for at least five years.
10. I frequently talk with New Virginia Majority staff members regarding best practices when registering voters, including voters who are students on college campuses. I stay abreast of the policies of registrars in Virginia counties in which college campuses are located.
11. My experience has been that, prior to this year, the Fairfax County Office of Elections had accepted and processed voter registration applications from George Mason University students who provided the 4400 University Drive and 4450 Rivanna Way addresses without providing their dorm name and room number.
12. Therefore, until recently, New Virginia Majority's policy has been to advise students to (1) register where they live, and (2) if they live on campus, it is acceptable to provide the

university address, and that it is not necessary to provide a dorm name and room number, when registering to vote.

13. It is my experience that, due to this policy, the vast majority of George Mason University students who register to vote using the 4400 University Drive and 4450 Rivanna Way addresses reside on campus.

14. New Virginia Majority has communicated with Fairfax County Registrar Gary Scott regarding the change to the county's policy earlier this year. On October 1, Mr. Scott sent an email to New Virginia Majority acknowledging the change in policy after a staff member asked him for clarification.

15. This was the first time we had been made aware of the change in Fairfax County's protocol. Students registered by New Virginia Majority over the summer who had supplied the 4450 Rivanna Way address were able to register and get on the rolls even if they did not provide their dorm name and room number.

16. Since October 1, 2019, New Virginia Majority's policy, which has been communicated to staff members and volunteers, is to ask George Mason University students to provide their dorm name and room number on their registration application.

17. I and other New Virginia Majority staff members have been forced to expend time and other resources to assist George Mason University students. Some of these students registered through our registration drives, but most of the folks who have reached out to us did not initially register through our registration drives. We have attempted to help all students who contact us with registering successfully and making sure they are eligible to vote in the November 2019 election due to the change in policy.

18. Micah Reaves, whose voter registration application was rejected due to a failure to provide a dorm name or room number, was registered through a New Virginia Majority registration drive.
19. New Virginia Majority staff contacted Mr. Reaves and informed him that his voter application had been rejected. We provided Mr. Reaves with guidance as to next steps he could take.
20. New Virginia Majority staff members' efforts to effectively advise affected students has been complicated by the lack of clear information and shifting explanations being provided by the Fairfax County Registrar's office and other officials.
21. The Fairfax County Registrar, Mr. Scott, has said that the students' applications have been rejected but also said that they can provide supplemental address information to the Registrar and be permitted to vote in the November 2019 election but am concerned that this option is not effective.
22. I am also concerned that the rejection notices do not mention any "cure" process and only mention an appeal option that requires the institution of a court action in circuit court, the scheduling of a hearing and the payment of a filing fee, in my experience, is an intimidating option that students unfamiliar with the legal system, without counsel and who have limited funds or time due to their school schedules, are likely to be deterred from pursuing.
23. I am concerned that affected George Mason University students have not been provided adequate notice concerning the next steps that they might be able to take to remedy the rejection of their registration application.

24. New Virginia Majority staff members and volunteers have received complaints from George Mason University students whose applications have been rejected since denial letters started going out on October 16, which was the book closing deadline for the November 5, 2019 election. We have also received calls and questions from other Virginia students concerned that they may not be able to vote using their campus registration address.
25. New Virginia Majority staff members have been proactively reaching out to students who attempted to register through our registration drives to see if their application has been rejected and, if so, help them to submit their dorm name and room number to Fairfax County election officials.
26. New Virginia Majority staff members have also reached out to county and state election officials to try to resolve the issue and ensure that affected students are able to vote in the November 2019 election.
27. New Virginia Majority has experienced a drain on its resources this year because at voter registration applications filled out by students at registration drives conducted by New Virginia Majority have been rejected.
28. If this problem had not arisen, New Virginia Majority staff members assigned to this issue would otherwise be going door to door educating registered voters about the November 2019 by informing voters where their precinct is, explaining Virginia's photo ID requirement, discussing issues with them, and generally encouraging them to go out and vote.

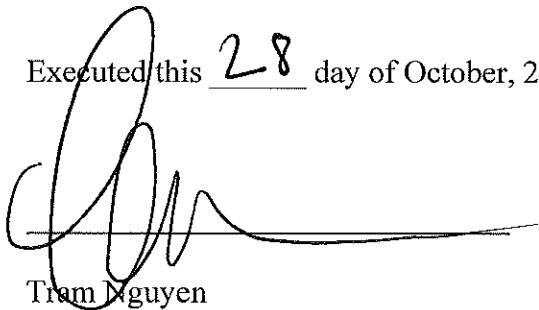
29. New Virginia Majority has contacted hundreds of fewer voters than they would have if this problem had not arisen because staff members are being pulled away from their get-out-the-vote work to assist affected GMU students.

30. Other organizations such as NextGen have also registered significant numbers of George Mason University students.

31. I am concerned that many George Mason University students, including many registered through New Virginia Majority registration drives, may not be able to vote in the November 2019 election and may be dissuaded from voting in future elections due to the new policy being employed by the Fairfax County Registrar.

32. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of October, 2019, in Richmond, Virginia.

A handwritten signature in black ink, appearing to read 'Tram Nguyen', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, thin horizontal stroke extending to the right.

Tram Nguyen